

From my understanding of the new rule, all flight instructors will require annual security awareness training. This training will cause undue hardship because it is the only annual required training for instructors; all other training is biennial. I also believe that requiring instructors to maintain records of citizenship of their students for 5 years is unreasonable, considering all other records must only be held for 3 years. I also believe that the citizenship verification should not be the responsibility of independent instructors. It should be done by the FAA when the application for a student pilot certificate is completed. I also am disturbed that the government seems to think the only threat is a foreign pilot receiving training in the U.S.